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**Apr 04 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Charleston County  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Case No. 2024-CP-10-03732

Appellate No. 2025-000237

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Joe Bryan,

Respondent,

v.

THI of South Carolina at Charleston, LLC  
d/b/a Riverside Health and Rehab,

Appellant.

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**MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL BRIEF OF APPELLANT**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
D. Jay Davis Jr. (SC Bar No. 12084)  
James D. Gandy III (SC Bar No. 11925)  
T. Ashton Phillips III (SC Bar No. 104227)  
Russell G. Hines (SC Bar No. 72100)  
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Charleston, South Carolina 29401  
(843) 720-5488

*Attorneys for Appellant*

COMES NOW Appellant, THI of South Carolina at Charleston, LLC d/b/a Riverside Health and Rehab, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(1), the deadline for Appellant's initial brief and designation of matter is Monday, April 7, 2025. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 30 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be May 7, 2025, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signature on next page]*

*[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellant, Appellate No. 2025-000237]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
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James D. Gandy III (SC Bar No. 11925)  
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Charleston, South Carolina

April 4, 2025

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent on April 4, 2025, by emailing (see attached email) a copy of the same to Respondent's counsel of record:

Samuel R. Clawson Jr., Esquire  
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Christy R. Fagnoli, Esquire  
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CLAWSON FARGNOLI UTSEY, LLC

*Attorney for Respondent*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

April 4, 2025

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Friday, April 4, 2025 1:48 PM  
**To:** Christy Fargnoli; laura@cfulaw.com; Sam Clawson; Bert Utsey  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Bryan v. THI; Appellate Case No. 2025-000237 (CR 230776)  
**Attachments:** Motion for Extension - Initial Brief.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
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